

Weldon Reed Allmand
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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

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§

CASE NO. 18-31205-13

**Anthony Lee Smith and
Stephanie Rochelle Smith
Debtor.**

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HEARING DATE: 10/4/2018

HEARING TIME: 2:00m

**MOTION TO REINSTATE CHAPTER 13
CASE FOR PURPOSES OF CONVERSION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Debtor, Anthony Lee Smith and Stephanie Rochelle Smith, and requests an order reinstating the above referenced Chapter 13 case after dismissal, and would show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. Debtors filed his petition in bankruptcy under Chapter 13 on 4/2/2018.
3. Debtors' case was dismissed for failure to make plan payments. The debtors have agreed that they will pay current by the hearing.

WHEREFORE, PREMISES CONSIDERED, Debtor Anthony Lee Smith and Stephanie Rochelle Smith respectfully requests that the Court enter an order reinstating his case under Chapter 13, and for any and such other relief as the Court may deem just.

Dated: September 27, 2018.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Weldon Reed Allmand

Weldon Reed Allmand

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on September 27, 2018 the office of Allmand Law Firm, PLLC did confer with the Chapter 13 Trustee's office and was advised that the Trustee is unopposed to the filing of this motion.

By: /s/ Weldon Reed Allmand
Weldon Reed Allmand
State Bar No. 24027134

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 27, 2018, a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

DEBTOR:

Anthony Lee Smith
Stephanie Rochelle Smith
4323 Marigold Trail
Mesquite, TX 75150

STANDING CHAPTER 13 TRUSTEE:

Tom Powers
Office of the Standing Ch. 13 Trustee
125 E. John Carpenter Freeway

U.S. TRUSTEE

Room 976
1100 Commerce Street
Dallas, TX 75242

By: /s/ Weldon Reed Allmand
Weldon Reed Allmand
State Bar No. 24027134